



THE CITY OF NEW YORK  
**LAW DEPARTMENT**

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February 22, 2023

**By ECF**

Honorable Jennifer L. Rochon  
United States District Judge  
Southern District of New York  
500 Pearl Street  
New York, New York 10007

Re: *E.W., et al. v. New York City Dep't of Educ., et al.*, 21-CV-1140 (JLR)

Dear Judge Rochon,

I am an Assistant Corporation Counsel in the Office of the Corporation Counsel, Sylvia O. Hinds-Radix, counsel for Defendants in the above-referenced action. I write jointly with Plaintiff's counsel to respectfully request a two (2) week extension of time to submit the parties' Stipulation of Settlement for the Court's endorsement.

The parties reached an agreement in principle to settle this case in December and have been working towards finalizing the Stipulation of Settlement since then. That Stipulation will provide for the Court to retain jurisdiction for the purposes of enforcement. Accordingly, pursuant to Your Honor's Order dated January 23, 2023 (Dkt. No. 57), the Stipulation must be submitted for the Court to "so order" by today. While the Stipulation of Settlement is largely finalized, Defendants take issue with certain provisions, which will require further discussion. Plaintiffs note for the Court that they were under the impression the parties had an agreement. Plaintiffs' counsel is currently out of the country and thus the parties need additional time to resolve these issues. The parties remain optimistic that this can be resolved within the next two (2) weeks.

Accordingly, the parties respectfully request that their time to submit their Stipulation of Settlement for the Court's endorsement be extended by two (2) weeks, or until March 8, 2022.

Thank you for Your Honor's consideration of this request.

Respectfully submitted,


s/  
Wynee Ngo  
Assistant Corporation Counsel

cc. **by ECF**  
Erin O'Connor, Esq., Of Counsel  
*Attorney for Plaintiffs*

The request is **GRANTED**. The parties shall file any motion to reopen the case or a Stipulation of Settlement if it requires the Court to retain jurisdiction by **March 8, 2023**.

Dated: February 23, 2023  
New York, New York

**SO ORDERED.**

  
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**JENNIFER L. ROCHON**  
United States District Judge